



August 18, 2016

Ex Parte

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: WT Docket No. 15-91

Dear Ms. Dortch:

On August 16, 2016, Cellular South, Inc.'s (d/b/a C Spire) VP of Wireless Network Operations, Eric Hollingsworth and the undersigned participated in a conference call with the FCC's Public Safety & Homeland Security Bureau Attorney Advisor James Wiley and Senior Electronics Engineer Rasoul Safavian. During this call, C Spire reiterated its previously stated¹ views on proposed changes to Wireless Emergency Alerts (WEAs) and noted the following:

- It is appropriate to distinguish between the character length requirements for LTE and non-LTE networks. An increased number of characters (e.g., 360) can be accommodated more readily, given a reasonable phase-in period of several years, by LTE network operators.
- Because the impact that embedded URLs in WEA messages would have on network traffic and consumer response to messages remains unknown, no changes regarding the inclusion of embedded URLs in WEA messages should be required of wireless carriers until **after** the Commission and the industry have had sufficient time to evaluate the results of a limited, voluntary pilot program designed to evaluate the network and user impact of embedded URLs in WEA messages.
- While C Spire's capabilities are likely not indicative of other wireless providers of similar or smaller size, it is equipped to utilize network-based techniques to support polygon-level geo-targeting of alert messaging and believes such limitations would result in less user-fatigue of WEA alerts.

¹ *Ex Parte* Letter from Benjamin M. Moncrief, VP, Government Relations, C Spire, to Marlene H. Dortch, Secretary, FCC, PS Docket No. 15-91 (filed June 24, 2016).

This *ex parte* notification is being filed electronically with your office pursuant to Section 1.1206 of the Commission's Rules.

Sincerely,

A handwritten signature in black ink, appearing to read "B. Moncrief". The signature is stylized with a large, looped "B" and a long, sweeping underline.

Benjamin M. Moncrief
VP, Government Relations
C Spire

cc (via email): James Wiley, Attorney Advisor, Public Safety & Homeland Security Bureau; Rasoul Safavian, Senior Electronics Engineer